



BP America Production Company  
501 WestLake Park Boulevard  
Houston TX 77079

P.O. Box 3092 M/S 2.100 B  
Houston TX 77253-3092

February 8, 2011

CERTIFIED MAIL 7010 0290 0001 5169 5152

Ms. Rebecca Weber  
Director, Air and Waste Management Division  
U.S. Environmental Protection Agency, Region VII  
901 N. 5<sup>th</sup> Street  
Kansas City, KS 66101

REC'D  
FEB 11 2011  
APCO

**Re: BP America Production Company – Hugoton Operations  
Notification of Engines Subject to 40 CFR Part 63 Subpart ZZZZ  
Initial Notification Form**

Dear Ms. Weber:

As required by 40 CFR 63.6645(a)(1) and in accordance with 40 CFR 63.9(b)(2), BP America Production Company (BP) is submitting this notification to inform the EPA that the engines listed in Attachment A located in the Hugoton Operations Area are now subject to 40 CFR Part 63 Subpart ZZZZ, the Reciprocating Internal Combustion Engine (RICE) Maximum Achievable Control Technology (MACT).

The EPA published amendments to 40 CFR 63, Subpart ZZZZ which included requirements for "existing" (as defined under the subpart) spark ignited (SI) RICE < 500 hp located at major sources of hazardous air pollutants (HAPs) and all existing SI engines at area sources of HAPs (published August 20, 2010); effective October 19, 2010). Please find an initial notification with the information required by 40 CFR §63.9(b)(2) attached.

If you need additional information, please call Ms. Alejandra Castaño at (281) 366-3828.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger G. Reddin".

Roger G. Reddin  
Hugoton Operations Manager

cc: Ms. Marian Massoth  
Chief, Air Operating Permit & Compliance Section  
Bureau of Air and Radiation  
Kansas Department of Health and Environment  
1000 SW Jackson, Suite 310  
Topeka, KS 66612-1366

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Will Higgs, BP  
Houston File

## Initial Notification of Applicability<sup>a</sup>

National Emission Standards for Hazardous Air Pollutants:  
Stationary Reciprocating Internal Combustion Engines  
**40 CFR part 63, subpart ZZZZ**

☒ Yes, I am subject to 40 CFR part 63, subpart ZZZZ National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

NAICS code(s): 211111

Compliance Date: ☒ Existing (before 6/12/2006) source: Oct 19, 2013

☐ New/reconstructed (on or after 6/12/2006) source: Upon initial startup

**Note: The Oct 19, 2013 compliance date for existing sources applies to the following engine types:**

- Existing stationary spark ignition (SI) RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions
- Existing stationary SI RICE located at an area source of HAP emissions

Company name: BP America Production Company

Facility name (if different): See Attachment A

Facility (physical location) address: See Attachment A

My facility is a (please choose one): ☐ Major source ☐ Area source \*See Attachment A

Owner name/title: BP America Production Company

Owner/company address: 501 Westlake Park Boulevard, Houston, TX 77079

Owner telephone number: (281) 366-2000

Owner email address (if available): \_\_\_\_\_

<sup>a</sup> Initial Notification is due 120 days after the effective date (10/19/2010) of the rule or 120 days after you become subject to the rule

If the Operator information is different from the Owner, please provide the following:

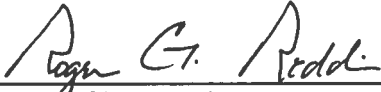
Operator name/title: \_\_\_\_\_

Operator telephone number: \_\_\_\_\_

Operator email address (if available): \_\_\_\_\_

Brief description of the stationary RICE at the facility, including number of engines and the site-rated HP of each engine: The natural gas-fired reciprocating internal combustion engines listed in Attachment A emit hazardous air pollutants and are affected sources under 40 CFR 63, Subpart ZZZZ requiring initial notification by February 16, 2011 [40 CFR 63.6645(a)(1)].

I hereby certify that the information presented herein is correct to the best of my knowledge.

  
(Signature)

2/8/11  
(Date)

Roger G. Reddin, Hugoton Operations Manager  
(Name/title)

(281) 366-8104  
(Telephone)